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## Japan

### Agricultural Situation

### Japan Reviews Pet Food Regulations

### 2007

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**Report Highlights:**

Japan is currently in the process of crafting guidelines on pet food health claims and the first regulation governing pet food safety. A review of the drafts of both of these documents suggests that they will offer a more clear set of procedures and standards for pet food producers and importers. No notably negative impact on imports is expected at this time but U.S. exporters should be aware of the requirements.

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Includes PSD Changes: No  
Includes Trade Matrix: No  
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## Executive Summary

Japan is currently reviewing two key aspects of its pet food marketing and distribution systems: health claims and pet food safety. Separate events led to this concurrent policy review. First, in the spring of 2007 a review of Japan's pharmaceuticals law highlighted the fact that the law did not address the special needs of the pet food industry and that current regulations and guidelines were not sufficient for addressing the pet food market. Thus, a Council has been established for reviewing the guidelines and publishing new guidelines pertaining to health claims on pet food packaging. Second, following the finding of melamine in pet food in June 2007, Japan's Ministry of Agriculture, Forestry and Fisheries (MAFF) together with the Ministry of Environment (MOE) established a Council to develop specific regulations governing the safety and distribution of pet food.

## Market Overview

Pets have become extremely popular in Japan in the past 10 years and currently there are 25 million pets living in Japan. Japanese pets rely heavily on imported pet food. Roughly USD 700 million worth of pet food is imported annually (equivalent to roughly 417,332 mt), 55% of total pet food consumption. Of that, 33% comes from the United States, roughly \$220 million in 2006.

Japanese imports of Pet Food for Dog and Cat (HS2309-10)							
Quantity(MT)							
Rank	Country	2001	2002	2003	2004	2005	2006
0	World	469,946	490,333	486,669	473,521	443,678	417,332
1	United States	199,031	180,047	159,453	145,300	144,873	124,907
2	Australia	149,135	164,011	168,322	161,338	142,102	121,838
3	Thailand	81,090	93,728	108,424	112,695	101,934	104,465
4	China	9,916	16,456	17,307	15,960	17,253	20,911
5	France	2,224	2,514	3,054	8,620	11,102	13,017

Source: Ministry of Finance

Japanese imports of Pet Food for Dog and Cat (HS2309-10)							
Millions of US Dollars							
Rank	Country	2001	2002	2003	2004	2005	2006
0	World	610.8	641.9761	682.0472	718.9005	711.3236	699.9858
1	United States	274.85	264.5009	253.2969	250.0583	247.3963	220.0127
2	Australia	146.15	156.5787	179.5311	196.7166	189.7868	191.9087
3	Thailand	115.11	123.2919	154.3133	161.6763	145.3359	131.5912
4	China	27.801	41.06312	45.52653	47.74208	62.11732	80.27573
5	France	3.0219	3.6536	5.320577	18.21932	24.64291	28.12598

Source: Ministry of Finance

Japanese pet owners take their pets very seriously. Pets are treated with great care and it's not uncommon to see a Japanese pet owner taking their dog for a walk – with the dog in a doggie stroller. Even if you cannot own a pet yourself, you can still have all the joy of pet ownership with little of the pain by renting a pet for a day, weekend, or more! The outlook is for pet ownership to trend upward and for spending to follow suit.

## Guidelines on Pet Food Health Claims

As there are no separate regulations governing pet food and pet food products they are subject to the provisions of the 1960 Japanese Drug Law for Animals (an adaptation of the Drug Law for Humans). This law was designed to protect humans from drug residues they would ingest by eating animal products treated with drugs and/or to protect animals from adverse effects of drugs in their feed. As such, it does not directly address the needs of animals that are kept as pets or the food that pets consume. That recently became clear when Customs officials took a strict interpretation of the Drug Law's labeling rules. Many pet foods include ingredients such as vitamins that are intended to promote pet health and packages are labeled to point out the health implications for pets to their owners. Even though the ingredients are legal, the labeling was called into question under the Drug Law. As a result of the confusion, many products were stopped at the port and a review of the Japanese standards was initiated. The draft guideline on pet food health claims was presented for comment on August 27 and comments were due to MAFF by September 21. The guidelines are slated to be issued sometime in December or January. A preliminary read out on the draft is that the new guidelines will help to clarify the requirements and thus remove some of the uncertainty for the trade.

### **Council for Securing Pet Food Safety**

The unfortunate incidence of U.S. dogs and cats falling ill and in some cases dying from eating pet food contaminated with melamine imported from China highlighted the lack of safety measures for pet food in Japan. The pet food products were recalled in the U.S. but continued to be sold in Japan because the Government of Japan did not have a clear mandate for recalling pet food. This fact raised awareness about the need for well-defined government oversight of pet food safety.

MAFF and MOE held the first meeting of the Council for Securing Pet Food Safety on August 20, 2007, and to date there have been four out of a total of five scheduled meetings. The final meeting will be on November 30, 2007. The Council, which is made up of academics, associations, industry and local government, is charged with reviewing how pet food safety is currently secured and make recommendations for Japan's rules.

The Council has determined that the pet food safety regulations should be established separately from the two existing laws that tangentially cover pet food safety: the Feed Safety Law (MAFF) and Animal Protection and Control Law (Ministry of Environment). An outline of the draft report was circulated on November 6. Leading up to it, the Council conducted hearings with pet food manufacturers to hear about their efforts to secure pet food safety. A similar hearing was held with pet food importers, retailers and associations. The Council reviewed pet food safety regulations and guidelines from a number of countries, including the United States, and will incorporate elements of those into the draft. Many sides had an opportunity to voice their desires and concerns. For example, some suggested that the new law could be more flexible than the Food Sanitation Law. Others opined that in addition to governing pet food safety the regulations should include labeling rules.

Taking all the aforementioned into account, the draft outline reveals that while the voluntary industry self-regulation is working well, the industry does not have the power to take all the necessary action to prevent and stop a safety crisis. This is particularly true given the number of companies that are not part of the industry groups charged with self-regulating. The regulations will be all-encompassing and will apply to manufacturing, import and distribution/retail and cover pet food for dogs and cats including: "General Nutritional Food", "Snacks" and "Other Purpose Food". Regarding imports, the outline noted that the importer should be clearly identified on the package and that importers' responsibilities should be clarified. The new regulations will be based on the Food Sanitation Law but should not be

excessive, according to the Council. Regarding labeling, the Council believes that the regulations need to ensure that important information is labeled; details on that are forthcoming. A transition period will be given in order to provide time for the industry to come into compliance.

Additional information on the draft safety regulations and health claims labeling guidelines will be available once they are released by the Government of Japan.